California Fair Political Practices Commission

MEMORANDUM

To: Chairman Getman and Commissioners Downey, Knox, Scott and Swanson

From: Holly B. Armstrong, Commission Counsel

John W. Wallace, Senior Commission Counsel

Luisa Menchaca, General Counsel

Re: Proposition 34 Regulations: Termination of Committees -- Second Pre-notice

Discussion of Proposed Regulation 18404.1 and Emergency Adoption of

Proposed Regulation 18404.2

Date: September 27, 2001

Introduction

At the July 2001 Commission meeting, the Commission requested that staff examine whether a rule mandating termination of candidate controlled committees was necessary and practical, and draft a regulation addressing termination of committees appropriate to Proposition 34.

The termination of committees regulation, proposed regulation 18404.1, was presented to the Commission at its meeting on August 3, 2001, for its first pre-notice discussion. At that meeting, the Commission, having requested additional options on redesignation from the previous regulation it had considered, requested that corresponding options be provided on the termination regulation as well. The Commission also requested that staff conduct further research on the actual time committees take to reconcile their books and wind up their operations, and the types of debt with which committees are likely to be left at the conclusion of a campaign. Therefore, this proposed regulation is presented for a second pre-notice discussion.

On August 28, 2001, staff met with a group of political consultants who shared their experiences regarding the ways committees conduct their businesses, the types of debts they incur, and the time it can take to wind down a campaign after an election. In addition, staff has compiled a chart, which is attached hereto as Exhibit A, prepared from all state candidate committees that file their reports electronically, which shows all open committees as of June 30, 2001 with debt remaining from an existing or previous campaign. The chart specifies the year of the election for which the debt exists, the amount of the debt, the amount of cash the committee has on hand, how much of the debt consists of a loan from a third party, and how much of the debt consists of accrued expenses.

The Commission was in agreement that the pre-January 1, 2001 committees controlled by candidates who never held or no longer hold the office for which the committees were formed should be terminated no later than December 31, 2002. Because of the amount of work that must be done to enable staff to give sufficient notice to those committees prior to the termination

deadline, we have segregated that portion of the proposed regulation, and present it for emergency adoption.

Background

Currently, a committee retains its status as a committee "until such time as that status is terminated pursuant to Section 84214." (Govt. Code § 82013(c).) Government Code § 84214¹ states:

> "Committees and candidates shall terminate their filing obligation pursuant to regulations adopted by the Commission which insure that a committee or candidate will have no activity which must be disclosed pursuant to this chapter subsequent to the termination. Such regulations shall not require the filing of any campaign statements other than those required by this chapter. In no case shall a committee which qualifies solely under subdivision (b) or (c) of Section 82013 be required to file any notice of its termination."

Previously, the Commission adopted a regulation governing the termination of a committee at the committee's discretion.² Under the current regulation, there is no deadline for the termination of old committees, and the primary incentive for old committees to formally terminate is that they will no longer have filing obligations.

While many committees do properly terminate, many committees remain on the books for years, some for decades after their candidates have left office. Some of these committees have debt. Some of these committees have funds. Staff has no way of estimating how many open committees exist that have not properly filed a Statement of Organization declaring their intent to terminate, as required under Regulation 18404.

¹ All further statutory references are to the Government Code, unless otherwise specified.
² Regulation 18404(b) provides that recipient committees are terminated as follows:

[&]quot;Recipient Committees. A treasurer of a committee which qualifies pursuant to Government Code Section 82013(a) may terminate the committee's status as a committee, only by completing the termination section on the Form 410 (Statement of Organization) declaring, under penalty of perjury, that the committee:

[&]quot;(1) Has ceased to receive contributions and make expenditures and does not anticipate receiving contributions or making expenditures in the future;

[&]quot;(2) Has eliminated or has declared that it has no intention or ability to discharge all of its debts, loans received and other obligations;

[&]quot;(3) Has no surplus funds; and

[&]quot;(4) Has filed all required campaign statements disclosing all reportable transactions."

Should the Commission adopt this mandatory termination process, a new tracking system will be put in place to ensure that current committees terminate according to the schedule set forth in the regulation. As with all new regulations, this regulation will be closely monitored to determine whether the scheduled times for termination are realistic, or whether adjustments need to be made through amendments.

Analysis of and Liability for Debt

As stated above, staff analyzed the data available from state candidate committees that filed their reports electronically regarding their outstanding debt. This analysis is reflected on the chart attached hereto as Exhibit A. The chart lists the year of the election for which the committee was formed, the amount of the debt, the amount of cash the committee had on hand at the time the report was filed, how much of the debt consists of a loan from the candidate, how much of the debt consists of a loan from a third party, and how much of the debt consists of accrued expenses (i.e. unpaid bills). Where possible, staff has specified to whom the unpaid bills are owed.

The chart lists all state candidate committees open as of June 30, 2001, with debt remaining from an existing or previous campaign. There are 67 open committees listed on the chart, the oldest of which is the "Committee to Elect Gary Miller" from the 1990 election. The chart also lists several committees for 2002 elections.

The analysis of this data demonstrates some very interesting facts. First, the total outstanding debt for all 67 committees listed is \$11,236,920. Of that amount, \$8,962,387, or **79.9%** of the total debt consisted of personal loans from the candidate to his or her own committee. Debt from unpaid bills comprised \$1,091,554, or 9.7% of the outstanding debt. However, \$441,451, of that \$1,091,554, or 40.4% of the accrued expenses, represents debt to campaign consultants or managers, as opposed to outside vendors. This left \$650,103 of the total accrued expenses owed to vendors, or only 5.8% of the total outstanding debt. Finally, \$960,770, or 8.5% of the debt is comprised of loans from third parties.

Although this data is only from those committees that file electronically, it is reasonable to conclude that these figures can be extrapolated into those committees that file paper reports.

According to the political consultants to whom we spoke, the types of vendors most likely to be owed money at the end of a campaign were graphic designers, printers and mail houses. The consultants said that they too, were often owed money at the end of a losing campaign, and they confirmed that losing candidates had a very difficult time raising money to pay campaign debts.

In summary, the termination of committees after some period of time is likely to affect a relatively small percentage of people who do business with political campaigns. To minimize the potential effects termination may have, we have included in this version of the proposed regulation, a provision requiring the committee to give notice to each of its creditors of its impending termination at least 60 days prior to the date it expects to file its termination. This will give any creditor sufficient time to initiate legal action to recover the debt owed to it, if it chooses to do so.

Staff considered including in the regulation a provision that would have allowed creditors to seek an extension from the Executive Director of the time for the committee's compliance with the regulation, similar to the extension the committees may obtain. However, this proved to be problematic in several respects. The creditors would lack standing to seek any kind of redress from the Executive Director, or from the Chairman, much less redress on behalf of the committee. Second, the creditor's remedy is properly found in the courts, not before the Commission.

With respect to liability to creditors, a comprehensive search disclosed no California case law on the subject. However, in *Karl Rove & Co. v. Thornburgh*, 39 F.3d 1273 (5th Cir. 1994), the Fifth District U.S. Court of Appeal found a candidate for U.S. Senate personally liable for a debt to a direct mail firm, even though the contract was between the direct mail firm and the candidate's committee. After determining that federal law did not preempt state law, the court applied by analogy the common law rule governing the liability of a member of an unincorporated nonprofit association to determine the liability of the candidate for conventional obligations incurred by the candidate's unincorporated campaign committee.

"Fundamentally, a member is personally responsible for a contract entered into by the nonprofit association only if – viewing him as though he were a principal and the association were his agent – that member authorized, assented to, or ratified the contract in question."

Id. at 1284.

Applying this principle to candidate Thornburgh, the court found that Thornburgh had known that his campaign had engaged a fundraiser to write direct mail letters, had edited and approved such letters, had provided a signature exemplar, and had provided lists of names and addresses to be used for such appeals. Therefore, despite the fact that he knew none of the particulars of the terms of the contract with the fundraiser, the court found that he had "authorized, assented to, or ratified the contract in question" and, thus, was personally liable for the debt.

Some creditors will have contracted directly with the candidate, and thus termination of the committee will have no effect on their legal rights. As to those creditors who contracted with the committee, it would seem likely that creditors of committees which have been terminated would have a remedy available to them through the courts, despite the fact that the committee no longer exists as an entity.

THE FORM AND SUBSTANCE OF REGULATION 18404.1

The proposed regulation would provide deadlines for candidate controlled committees to terminate, taking into account whether or not they are subject to Proposition 34, and whether or not the committees have debt. There is a range of options from which the Commission may choose regarding the appropriate deadlines for each category of committee, taking into account the information we received from the political consultants regarding the actual time it can take to

receive all of the bills after the end of a campaign. The regulation also requires that the campaign bank account be closed at the time of termination and that a successful candidate for elective state office close any open local committees he or she controls. The regulation provides a procedure for obtaining an extension from the deadlines for termination of a committee under certain specific circumstances, or for good cause shown on a case-by-case basis, with options for a final decision by the Executive Director or an appeal to the Chairman on the matter.

The beginning of the regulation, subdivisions (a) and (b), is divided into "Pre-2001 Committees" and "2001 and Post-2001 Committees," addressing committees to which Proposition 34 is not applicable (pre-2001), and those to which Proposition 34 is applied (2001 and post-2001). This is not really a Proposition 34 regulation, in that it does not arise out of a Proposition 34 statute. Rather, it is presented here to address all termination questions at once.

Subdivision (a)

Subdivision (a) invokes the provisions of Regulation 18404 in terminating any committee organized for a pre-January 1, 2001 election.

Subdivision (a)(1) is directed to those candidates elected prior to January 1, 2001, and thus, prior to Proposition 34, but who are still in office.

Decision 1, Options a and b (Redesignation Not Permitted) and (Redesignation Permitted)

Decision 1, Options a and b provide language intended to accomplish the same result, depending on whether the Commission chooses to allow committees to redesignate for future elections or not.³ Therefore, only one discussion of the subdivisions will be provided below. If the Commission chooses not to permit redesignation, it should adopt Option a. If the Commission chooses to permit redesignation, it should select Option b.

Subdivisions (a)(1)(A) (under both **option a** and **option b**) require that committees with no debt be terminated within either 9 or 12 months after the end of the term of office, whichever option the Commission selects.

Subdivisions (a)(1)(B) address committees that have debt, and require that these committees be terminated no later than 12, 18 or 24 months after the end of the term of office, depending on the option selected by the Commission. As shown on the attached list of committees with outstanding debt, as of June 30, 2001, outstanding debts for these pre-2001 electronically filing committees ranged from \$6,147.00 to \$1,469,303.00. Therefore, a broader range of dates is provided for the Commission's consideration on this issue. However, despite the magnitude of some of the debt, a longer open period is not recommended, given the potential for misuse of these pre-Proposition 34 accounts. At the interested persons meeting regarding this proposed regulation held on July 18,

³ This is separately discussed in another memo. Option b of the regulation refers to proposed regulation changes discussed there. (Regulation 18521(b).)

2001, the regulated community expressed concern about the forced closure of committees with debt, and the possible elimination of a legal remedy by vendors and other creditors that would result from the Commission's action. It should be noted, however, that the proposed regulation includes a provision for notice to creditors, and for an extension to be considered on a case-by-case basis, which provides a safeguard against non-payment of debt where there is a genuine means to pay it. In addition, creditors always have a remedy in the courts to collect the debt owed to them. (See *Karl Rove & Co. v. Thornburgh, supra, 39 F.3d 1273.*) Further, the large percentage of debt to a candidate from personal loans to his or her committee should also be noted. For example, the figure noted above of \$1,469,303 as the largest pre-2001 outstanding committee debt represents a loan from the candidate to his or her committee.

Subdivision (b)

Subdivision (b) is directed to committees to which Proposition 34 is applicable, i.e., those committees designated for elections on or after January 1, 2001, and, in Decision Point 4, provides for the Commission's decision on the redesignation issue. Once again invoking the requirements of Regulation 18404, subsections (b)(1) and (b)(2) address, respectively, committees with and without "net debts outstanding," as that term is defined in proposed Regulation 18531.6.

Subsection (b)(1) directs that committees without net debts outstanding must be terminated no later than 9 or 12 months after the end of the term of office for the successful candidate, and 9 or 12 months after the election for the unsuccessful candidate, depending on the time limitation the Commission selects.

Subsection (b)(2) gives committees with net debts outstanding 12, 18, or 24 months, depending on which time limitation the Commission selects, after the end of the term of office for the successful candidate, and 12, 18, or 24 months after the election for the unsuccessful candidate, to raise funds to pay off their debt. Pursuant to this section, the committee must be terminated at the conclusion of that time period.

These time periods reflect information gathered from the political consultants to whom we spoke, and their experience regarding the length of time it takes to reconcile the books and obtain all bills and credits after the end of a campaign.

Subsection (b)(3) provides that all time periods under subdivision (b) will not begin to run until the regulation becomes effective. This allows sufficient time for those candidates who ran in special elections in February, March or April of 2001, for whom a 9- or 12-month deadline would be approaching or even past if the regulation is adopted in December, to wind up their committees within the time frames contemplated under the regulation.

Subdivision (c)

The purpose of this subdivision is to make it clear that termination of the committee ends all activity of the committee, and that any further contributions received must be returned and the candidate must close the campaign bank account.

Subdivision (d)

Frequently, a candidate for elective state office will have one or more local campaign committees open at the same time as he or she is running for state office. For example, he or she may be a sitting county supervisor or city councilman, and may run for State Assembly. In that case, he or she would have a committee for his or her local office, as well as for the State Assembly. This subdivision would require the candidate to close all open local committees for past elections upon election to a state office. Thus, if the candidate were unsuccessful in his or her bid for State Assembly, the local committee would remain intact. However, once elected to the State Assembly, the candidate has no further need for his or her county supervisor committee, and there is no reason that it should not be closed expeditiously. We have provided the Commission with the options of 12, 18 or 24 months from the election in which the candidate was elected to the state office.

The regulated community expressed no objection to this proposal.

Subdivision (e)

This subdivision would require the committees to give notice to any creditors at least 60 days before their impending termination.

Subdivision (f)

In discussions regarding this regulation, both internally and at the interested persons meeting, it was almost uniformly felt that there should be a provision to extend the time within which to fulfill the requirements of this section, for good cause shown. Therefore, this subdivision provides the procedure for seeking an extension from the Executive Director, with a requirement for submitting a request for an extension 30 days prior to the termination date. The extension could be for a period of up to 6 months. Further extension requests must be submitted no later than 30 days prior to the expiration of the extension. Subsections (f)(1)(A) and (B) provide specific guidance for obtaining relief when a committee is receiving contributions and has the ability to pay its debts. Subsection (f)(2) allows a committee to obtain an exemption upon a showing that payment arrangements have been made with third-party creditors, and a demonstration of how the committee will meet the obligation. Subsection (f)(3) allows consideration of litigation as a reason for continuing the existence of a committee. Subsection (f)(4) provides for a case-by-case consideration of special circumstances, if good cause can be shown for allowing a committee to remain open beyond the deadline imposed by the regulation.

Subdivision (g)

Since Proposition 34 is not applicable to local candidates, and the problems this regulation will address will not arise in the local context, there is no need to apply this regulation to local committees. Further, there is a general consensus among staff that it would be difficult to educate local candidates concerning this rule, and that applying this rule to local candidates would be inviting numerous violations, where the present system has not proven to be problematic on the local level.

Recommendations

The major decision points involved in this regulation are those dealing with the redesignation issue. On that subject and the decision points and options affected by that decision, staff makes no recommendation, other than that the Commission's decisions here should be consistent with its approach under the one-bank-account issues. With respect to the decision points dealing with various deadlines, staff makes no recommendations on those points, except to say that the time spans presented are within the reasonable realm, according to our research. Staff makes a recommendation on only one decision point, which is that dealing with the requirement that notice be given to creditors prior to the termination of the committee. On that issue, staff recommends that the language be adopted.

Decision Points

Decision 1, Option a (Redesignation Not Permitted) and Option b (Redesignation Permitted)

Decision 1, Option a, is a redesignation issue, to be selected if redesignation is not to be permitted. Staff makes no recommendation, except that the decision should be consistent with the Commission's decision on redesignation in the context of the one-bank-account issues.

Decision 2

Decision 2 relates to candidates whose committees have no debt and appears in different subdivisions and in various contexts. The Commission is asked to decide whether the candidate controlled committee should be required to terminate 9 or 12 months after the date that signifies the end of their term of office or, if they redesignate, when they leave the specific office to which they were elected, or 9 or 12 months after the general or special runoff election for the losing candidate. Staff makes no recommendation.

Decision 3

Decision 3 relates committees with debts and also appears in different subdivisions and in various contexts. The Commission is asked to decide whether the candidate controlled committee

should be required to terminate 12, 18, or 24 months after the date that signifies the end of his or her term of office or, if they redesignate, when they leave that specific office to which they were elected, or 12, 18 or 24 months after the general or special runoff election for the unsuccessful candidate. Staff makes no recommendation.

Decision 4

This is a redesignation issue, to be selected if redesignation is to be permitted. Staff makes no recommendation.

Decision 5

Decision 5 relates to the requirement for the committee to give written notice of its impending termination to its creditors not less than 60 days before its termination is filed.

Staff Recommendation: Staff recommends that this language be adopted.

Decision 6

Decision 6 deals with the provision providing for an extension of time in which a committee may comply with the requirements of this regulation and whether the decision of the Executive Director regarding the extension shall be final, or whether an appeal to the Chairman should be available. Staff makes no recommendation regarding this decision point.

EMERGENCY ADOPTION OF PROPOSED REGULATION 18404.2

At the August 3, 2001 Commission Meeting, the Commission was in agreement that committees that had been organized for an election held prior to January 1, 2001, but which were controlled by candidates who never held or who no longer hold the office for which the committees were formed, must be terminated as soon as possible. Therefore, we present this regulation for emergency adoption, to facilitate the timely termination of these committees at the earliest possible date, which we have determined to be December 31, 2002.

- (a) **Pre-2001 Committees.** Any candidate controlled committee organized for elective state office for an election held prior to January 1, 2001, must be terminated as set forth in 2 Cal. Code Regs. section 18404 and as follows:
- (1) Committees controlled by candidates who never held or, as of the effective date of this regulation, no longer hold the elective state office for which the committees were formed must be terminated no later than December 31, 2002.

Decision 1 – Notice to Creditors

We have also included in this emergency regulation the provision discussed above, which requires the committees to give notice to any creditors at least 60 days before their impending termination.

{Decision 1}(2) No less than 60 days prior to filing its Statement of Organization (Form 410) with the Secretary of State, declaring its termination, the committee shall give notice of its impending termination to all creditors to whom it owes outstanding debts. Such notice shall include the date upon which the committee expects to file its Statement of Organization with the Secretary of State.

Staff Recommendation: Staff recommends that this provision be adopted.

Decision 2 – Executive Director Final or Appeal to Chairman

We have included in this emergency regulation the "safe harbor" provision that was included in the original regulation, whereby a committee may seek from the Executive Director an extension of time to comply with the requirements of the regulation. This subdivision has been modified somewhat from the prior version, to reflect the Commission's comments from the last meeting. There is also now a **Decision Point**, concerning whether the Executive Director's decision regarding the extension should be final, or whether the applicant should have the right to appeal the decision to the Chairman.

(b) A committee subject to subdivision (a) of this regulation may submit a request to the Executive Director of the Fair Political Practices Commission for an extension of up to six months' duration in which to comply with the requirements of this section. Such a request shall be submitted to the Executive Director no later than 30 days prior to the original due date for the committee's termination. Once an extension has been granted, any funds raised by the committee must be used to pay off the existing debt or to pay for fundraising costs. Requests to renew the extension for additional periods of up to six months must be submitted to the Executive Director no later than 30 days prior to the expiration of the prior extension.

The Executive Director's decision regarding the granting or denial of the extension {Decision 2}[shall be final/may be appealed to the Chairman within 10 days of receipt of the denial]. In denying or granting the request for extension, the Executive Director shall consider the following:

- (1) Whether the committee:
- (A) Is continuing to receive contributions toward its outstanding debts;
- (B) Anticipates receiving contributions in the future toward its outstanding debts; and
- (C) Currently has the ability to discharge all of its debts, loans and other obligations;
- (2) The existence of third-party debts and the extent to which payment arrangements with one or more third-party creditors have been made and entered into in writing, and the extent to which the candidate demonstrates how the committee will meet the agreed-upon payment schedule;
- (3) Whether the committee is a party to litigation or anticipates the filing of litigation with a third-party creditor regarding debts arising out of goods or services provided to the candidate or the candidate's controlled committee; or
- (4) Other good cause shown.

Staff Recommendation: Staff makes no recommendation on the issue of whether the Executive Director's decision should be final, or whether an appeal to the Chairman should be permitted.

Dickerson for Assembly	Election	Debt	Ending Cash	Loan From Candidate	Loan From Third Party	Accrued	
Brace Hu for Assembly	2000	12,053	9,488	12,053	Timu Party	Expenses	Comments
omm. To Elect Gary Miller	2000	120,577	36,779	118,077		 	
Allier for Assembly	1990	300,657	1,929	300,657	2,500	 	
riends of Sen. Richard Alarcon	1996	125,000	25,249	125,000	 J		
Itizens for Rod Wright (Assu)	1998	45,895	41,597	120,000	+	·	
dward Vincent for Assembly	2000	85,005	-	9 225	40,000	5,895	
gnazarian for Assembly	2000	8,685		9,225		75,780	\$75,780 Acc.Exp. To Printco Graphics
Intonio De La Rosa for Assembly	2000_	125,000	631	405.000	 	8,685	The state of the s
riends of Kevin Murray	2000	12,861		125,000		1	
lavice 2000 Committee	1996	1	(3)	,—— <u> </u>	12,861	i	
lavice 2000 Committee (Assy)	2000	6,147	(3)	n/a	n/a	n/a	
riends of Thomasina Reed (Assy)	2000	11,119	374	,J		6,147	
Homasina Reed for Assembly	2000	45,473	1 500	8,700	1	2,419	
ohannessen for Senate - 93	1993	130,200	1,592	26,200	1	19,273	
arole Hayashino for Assembly	2000		24,726	130,200	1	10,210	
gueroa for Senate 2002	2001	1,924				1,924	
riends of Lynn Daucher (Assy)	2000	100,254	76,155		100,000		_[
at Wiggins for Assembly	2000	357,015	176,595	208,000	62,000	97.04E	Loan from CA Latino Pac
ennett for Assembly 2000	2000	42,535	19,090		,	42.525	\$80,000 Acc.Exp to O'Melvaney & Myers
dward Vincent for Senate	2000	1,289,686	509	1,289,686		42,535	\$38,000 Acc.Exp to Reilly & Assoc.
riends of Mason (Assy)		212,000	100,628	unk	unk		
eam Noel '98 (Lt. Gov)	2000	12,000	27		UIIN	unk	Unknown; no sources reported
omm. To Elect Kevin Pane (Assv)	1998	1,469,303	81	1,469,303		12,000	
Frkins for Assembly	2000	10,119	808	unk	······		
aura Perry for Assembly	2001	67,862	109	27,000	unk	unk	Unknown, no semi-annual filed
ie Jackson for Assembly	2000	172,009	1,764	172,000	<u> </u>	40,862	
hn Steel for Assembly	2000	205,081	591		15.55		
ssy Republican PAC Scott Baugh	2000	63,942	1,200	112,000	10,000	83,081	\$79,000 Acc.Exp. To Russo Marsh & Ass
mm To Floot Stainmail (A)	1998	44,894	3,265	63,942			ASS
omm. To Elect Steinmeier (Assy)	2000	60,500	3,205	7,500		37,394	Loan from previous committee
iends of Paul Koretz (Assy)	2000	88,912		60,500			2001 Hottl Previous Continuities
omm. To Elect Tom Harman (Assy)	2000	67,645	9,001		70,000	18,912	
iends of Elihu Harris for Assy	2000	84,239	2,500		3,500		CEC 000 A E
alg Missakian for Assembly	1994		652	26,000	-	58,239	\$56,000 Acc.Exp. To O'Melvaney & Myer
ssakian for Assembly 2000	2000	79,011	-	46,995		32,016	
n Kay for Assembly	2000	59,500	1,979	35,000	24,500	32,010	+
tizens to Elect Russ Bogh (Assu)		44,671	1,002		24,000	44 674	
iss Bogn for Assembly 2000	2001	99,487	17,180	68,900		44,671	\$44,671 Acc.Exp to Russo Marsh & Asso
b Pacheco for Assembly 2000	2000	348,286	432	291,378	45,000	00,007	
TOUCH THE STREET	2000 ·	194,500	8,253	163,871	45,000 30,000	11,908 629	

Rod Pacheco for Assembly 2000	2000	75,981	T		•		
Elinu Harris for Assembly 2000	2000		5,453		75,891		
Friends of John Campbell (Army)	2000	10,000 30,000	753	10,000			
Richman for Assembly 2000	2000		14,114	30,000			
Soto for Senate	2000	387,052	15,647	375,000		40.050	
Carol Liu for Assembly	2000	99,254	19,003			12,052	
Friends of Mark Wyland (Assy)	2000	634,066	52,519	634,066		99,254	Errors on stmt \$99K is a deflated figure
Friends of Jay La Suer (Assy)		541,691	41,488	541,691			
Strickland for Assembly	2000	20,000	5,244		20 000		
Strickland Leadership Fund	2000	138,920	20,957		20,000		
Nakanishi for Senate	2000	-	(343)	n/a	84,500	54,420	
Greg Rolen for Assembly	2000 -	140,563	2,353		n/a	n/a	
eja for Assembly	2000	26,845	94	99,500	41,000	63	
Sally Lieber for Assembly	2000	51,442	248			26,845	
Sam Blakesion for A	2002	223,818	214,210	33,000	15,000	3,442	
Sam Blakeslee for Assy-Exploratory	2002	101,000			223,818		3rd party loop I I I
Friends of Dion Louise Aroner (Assy) Aroner for Assembly	2000	6,406	94,924	101,000			3rd party loan might be from spouse
Condill for Assembly	2000	10,000	112			6,406	
Cogdill for Assembly	2000	10,437	23		10,000	0,400	
ony West for State Assembly	2000	43,945	5,252			10,437	
Steve Blanton for State Assembly			3,902		25,000	18,945	
John. To Re-Elect Tom Calderon (Acc.)	2000	13,773	4,511				
argendes for Treasurer	2000	14,737	41		•	13,773	
Martin Gallegos for State Senate	2001	85,000	8	85,000		14,737	
viguello for Assembly		7,895	591			7.00=	
fountjoy 2000 Dennis Mountiev	2001	70,014	479		200	7,895	
athleen Connell Comm (Controller)	2000	65,000	14,347		200	69,814	
udy Chu for Assembly	2002	2,087,419	1,584,372	2 097 440	65,000		
nthony Pescetti for Assembly	2001	18,515	963	2,087,419			
- Scell for Assembly	2000	119,100	25,790	18,515			
			23,790	50,000		69.100	\$68,000 Acc.Exp to Admail West
	Totals:	11,236,920					TO Admail West
		11,230,920	2,691,558	8,962,387	960,770	1,091,554	